

RAFT
FY21 Administrative Plan
& Scope of Services
July 1, 2020

Contents

I.	Introduction	3
II.	Target Population.....	3
i.	Traditional Population.....	4
ii.	Expanded Population	4
III.	FY20-21 Rent Arrears Pilot.....	4
IV.	Household Eligibility.....	5
iii.	Screening Tool	5
iv.	Housing Crisis	5
v.	Income Eligibility	7
vi.	Immigration Status	7
vii.	Prior Assistance	8
V.	Use of the RAFT Benefit	8
VI.	Accessing the RAFT Benefit.....	9
viii.	Regional Administration	9
VII.	Documentation	11
ix.	Identification	11
x.	Proof of Income.....	11
xi.	Proof of Housing.....	12
xii.	Rent Arrearage	12
xiii.	Rent Arrearage for Families Residing in Subsidized Housing	12
xiv.	Utility Arrearage or Heating Fuel	13
xv.	Move-in Costs.....	13
xvi.	Monthly Rental Stipend Payment	14
xvii.	Property Owner Documentation.....	14
xviii.	Conflict of Interest.....	14
xix.	Participant File.....	14

VIII. Denials and Administrative Reviews	15
xx. Denials	15
xxi. Administrative Reviews	16
xxii. Immediate Termination.....	16
IX. Fair Housing and Language Access	17
X. Accounting and Fiscal Management.....	17
xxiii. Allocation of Funds.....	17
xxiv. Financial Management.....	18
XI. Vendor Payments.....	18
XII. Data Collection.....	18
XIII. Reporting.....	19

Introduction

The Residential Assistance for Families in Transition (RAFT) program is a flexible financial benefit designed to prevent homelessness for households facing housing crises in Massachusetts. RAFT provides flexible financial assistance designed to meet each eligible household's unique needs. Eligible payments include, but are not limited to: moving costs, rent arrears, utility arrears, rental stipends, and financial incentives to a primary tenant who agrees to host a household who would otherwise become homeless. All interventions focus on helping households to develop, pursue, and/or maintain housing stability.

The program is administered on a regional level by the Department of Housing and Community Development (DHCD)'s nine Regional Administering Agencies (RAAs) and two HomeBASE Administering Agencies, Lynn Housing Authority and Neighborhood Development (LHAND) and Central Massachusetts Housing Alliance (CMHA). Throughout this Administrative Plan, these 11 agencies are referred to as the "RAFT Agencies." The RAFT Agencies are responsible, to the extent funding allows, for the day-to-day operation of RAFT statewide. This includes triaging applicants through the Housing Consumer Education Centers (HCECs) at the RAAs and through the Resource Center at LHAND and the Housing Counseling Program at CMHA, providing information on community-based resources, conducting RAFT screens, reviewing RAFT applications, administering RAFT payments, and reporting on RAFT outcomes.

This Administrative Plan will govern the provision of RAFT assistance and will be incorporated into the contracts between DHCD and the RAFT Agencies.

Target Population

RAFT targets households who, but for this assistance, would imminently become homeless. The households served through RAFT are households at risk of homelessness with

- i. a household income not greater than 30% of Area Median Income who are homeless and moving into subsidized or private housing or are at risk of becoming homeless; or
- ii. a household income greater than 30% but not more than 50% of Area Median Income who are homeless and moving into subsidized or private housing or are at risk of becoming homeless **due to a significant reduction of income or increased expenses**; or
- iii. a household income greater than 50% but not more than 60% of Area Median Income who are at risk of injury or harm due to domestic violence in their current housing situation.

RAFT can serve two distinct populations: the "Traditional Population" and the "Expanded Population." The RAFT Agency must indicate in each applicant's Housing Pro record whether the household is part of the Traditional Population or the Expanded Population using the "Dependent under 21 (Y/N)" field in the Program tab of the Occupancy module.

Traditional Population

Eligible “Traditional Population” households are families comprised of two or more people living together, at least one of whom is a dependent child under the age of 21 (up until 21st birthday), or a single pregnant head of household. If a child is in the custody of the Department of Children and Families (DCF) and will be reunified with the parent if he/she obtains housing, the family may include the child in the RAFT household. However, no funds may be expended on the family’s behalf until the child has been reunified with the parent and this has been verified in writing by DCF. If a dependent child is in the legal physical custody of someone outside of the household (not DCF), the applicant may not include that child in the RAFT household.

Expanded Population

Eligible “Expanded Population” households are households of all sizes and configurations, including but not limited to elders, persons with disabilities, and unaccompanied youth. The Expanded Population includes any household that does not meet the definition of the Traditional Population.

FY20-21 Rent Arrears Pilot

In FY20, a pilot program aimed at increasing upstream homelessness prevention allowed for the RAFT agencies to screen households under two new housing crises: “Upstream Rent Arrears” and “Upstream Mortgage Arrears.” \$7M was allocated to this pilot program in FY20 and funds were designated as carrying over into FY21. The RAFT agencies have until June 30, 2021 to spend these funds. Households applying under this housing crisis must provide the following verification:

- Notice of rent arrears issued by the rental property owner *or* notice of mortgage arrears issued by mortgage lender
- Demonstration of a financial hardship (reduction in revenue, increase in expenses, and/or subsidy calculation issues that cannot be resolved timely) that caused the nonpayment of rent
- Demonstration that payment of the arrears will allow the household to retain their housing. *This requirement is waived during the COVID-19 pandemic and DHCD will notify the RAFT agencies when it is being reinstated.*

In addition to the above criteria, households must meet all other RAFT eligibility criteria outlined in the Program Guidance in order to be approved for funds through the upstream prevention pilot.

Upstream RAFT can provide no more than four months’ worth of a household’s rent or mortgage payments, not to exceed the total RAFT limit of \$4,000.

Household Eligibility

Screening Tool

Eligible households are those who meet the following criteria, identified by the RAFT Screening Tool, also known as the RAFT screen:

1. Have an eligible housing crisis that will render them homeless within 30 days
2. Have income that is below 30% AMI or have income that is between 30-50% AMI and can demonstrate a significant reduction in income or increase in expenses
3. Score at least 7 points (traditional population) or 4 points (expanded population) on the RAFT screen

RAFT Agencies have the discretion to approve 'screen score overrides' by waiving a score lower than 7 (traditional population) or 4 (expanded population). RAFT agency supervisors may approve overrides for households who score below the minimum screen threshold but who exhibit other risk factors for homelessness. These risk factors should be described in writing on the RAFT screen.

Housing Crisis

All families who are found eligible for RAFT must demonstrate one of the eligible housing crises, listed below and on the RAFT screen. A family may not receive RAFT without demonstrating one of these crises, even if their intended use of RAFT matches one of the allowable payment types.

Each family must provide the following verification of the housing crisis in accordance with the table on the following pages:

Housing Crisis	Required Documentation
Upstream rent arrears	Notice of rent arrears issued by landlord with verification of amount owed
Upstream mortgage arrears	Notice of mortgage arrears issued by lender with verification of amount owed
Eviction from a private dwelling	Summary Process Summons and Complaint with verification of amount owed <i>A summary process summons and complaint is not required during the COVID-19 pandemic and DHCD will notify the RAFT agencies when this requirement is reinstated</i>
Eviction from public or subsidized housing	Summary Process Summons and Complaint with verification of amount owed <i>A summary process summons and complaint is not required during the COVID-19 pandemic and DHCD will notify the RAFT agencies when this requirement is reinstated</i>
Doubled up and must leave	Letter from the primary tenant or landlord, including the address where the family is staying, that verifies that the family is being asked to leave within 30 days
Health & safety	Documentation to demonstrate a serious health and safety risk that prevents the family from continuing to live in the unit, such as a condemnation order from the Board of Health or a failed inspection report
Foreclosure	Letter of intent to foreclose from lender <i>A letter of intent to foreclose is not required during the COVID-19 pandemic and DHCD will notify the RAFT agencies when this requirement is reinstated</i>
Severe overcrowding	Documentation to demonstrate that the current unit is too small for the number of people residing there, such as a letter from

	the landlord verifying the number of people and bedrooms in the unit
Domestic violence	Documentation to support a domestic violence allegation connected to an inability to stay safely in current housing
Fire/Flood/Natural disaster	Report of fire, flood, or natural disaster
Utility shutoff	Current utility shutoff notice or verification that service has already been disconnected <i>A shutoff notice is not required during the COVID-19 pandemic and DHCD will notify the RAFT agencies when this requirement is reinstated</i>
Other crisis that will result in housing loss within 30 days or less	Documentation to demonstrate that the family will become homeless within 30 days

Income Eligibility

All approved households must have income at or below 50% AMI, with the exception of households who are at risk of injury or harm due to domestic violence in their current housing situation, who must have income at or below 60% AMI. At least half of all FY21 funding must be provided on behalf of households with income below 30% AMI. The RAFT Agency must document each household's gross income using income verification dated within the last 60 days at the time of application and reflecting an entire month's worth of consecutive pay stubs or other income. This income must be annualized based on the most recent month of pay at the time of application.

To ensure that payments to households between 30-60% AMI do not exceed 50% statewide, each RAFT Agency must ensure that it does not spend more than 50% of its own RAFT allocation on behalf of families with income above 30% AMI.

Immigration Status

Households do not need to have legal immigration status in order to qualify for RAFT. However, any applicant or household member who has been issued a Social Security Number must provide it and the RAFT Agency must document it in Housing Pro.

Prior Assistance

Families who have been terminated from Emergency Assistance (EA) shelter or from HomeBASE in the last 12 months are ineligible for RAFT. DHCD can verify an applicant's termination from either program upon request and with an authorization for release of information.

Use of the RAFT Benefit

Examples of allowable uses of RAFT funds are summarized below, but the list is not exhaustive. RAFT is intended to be flexible enough to respond to individual circumstances. Eligible participant families can receive assistance in any combination of benefit types, provided that the total amount of assistance does not exceed \$4,000 within 12 months. Families may access program funds more than once in a given year, subject to the availability of funds, as long as they do not receive more than \$4,000 within 12 months.¹ A family needs to be found newly eligible—including housing crisis, income, and risk factors—each time they receive funds, even if they have already received funds that year.

In determining how RAFT can stabilize a housing situation, RAFT agencies will prioritize the various barriers and expenses that are preventing housing stability. Agencies will use RAFT for those items that will provide the most stability up to the \$4,000/year limit and will provide only what is necessary for the family to avoid homelessness by resolving the identified housing crisis.

The Department anticipates the following uses commonly observed to support housing stability and avoid homelessness:

- Rent arrearage
- Rental stipends
- Start-up costs (first, last, security)²
- Moving costs
- Utility arrears
- Furniture (only applicable to families moving to a new apartment, and furniture payments may not exceed \$1,000)³

To support families moving to a co-housing situation, RAFT will also allow incentive payments to primary tenant and landlord, including:

- Partial rent payments on behalf of primary tenant (paid to property owner)
- Utility payments on behalf of primary tenant (paid to utility company)

¹ Some families with housing subsidies who are applying for RAFT for rent arrears may be limited to less than \$4,000 within 12 months. See "Rent Arrearage for Families Residing in Subsidized Housing" in "Documentation" section.

² Moving-related expenses may only be paid for one move per year per family, except when a subsequent move is caused by a direct threat to the family's safety or a serious health condition of a family member that cannot be reasonably accommodated in the original housing arrangement.

³ In extraordinary circumstances, RAFT Agency supervisors may request a waiver from DHCD allowing them to exceed the \$1,000 furniture limit for a family.

- Grocery gift cards

RAFT payments for rent or utility arrears may only be used when the arrearage on the account was acquired by and is in the RAFT participant's name. As with any RAFT payment, utility payments may only be made if they connect to resolving one of the eligible RAFT housing crises listed on the RAFT screen.

Additional supportive uses, if they allow a household experiencing an eligible RAFT housing crisis to maintain housing or avoid homelessness, include:

- Car repair/transportation costs
- Extraordinary medical expenses
- Child care from licensed provider, including payments for summer camp
- Legal assistance
- Financial literacy and budgeting classes
- Financial aid for educational expenses (registration, tuition or fees not covered by financial aid, required textbooks, etc.)
- Certified Adult Basic Education classes (GED/HiSET, ESOL, literacy, etc.)
- Job training and attainment (job skills classes, interview clothing, tools for licensed trades, etc.)

Travel expenses are available to families who can resolve their housing crisis by moving out of state. RAFT providers should identify the most economical strategy to support an out-of-state move. Start-up costs such as first month's rent, last month's rent, and security deposit may be paid for families moving out of state, but no ongoing assistance (such as rental stipends) may be provided through RAFT on behalf of these families.

Accessing the RAFT Benefit

RAFT Agencies should present RAFT as one tool of their overall housing counseling program. Applicants may be self-referred or may be directed to the RAFT Agency by a partner agency such as DHCD, another state agency, housing court, or a social service agency. While RAFT Agencies may develop their own specific processes for completing intakes, screens, and applications, each RAFT Agency must have a prioritization process in place for families who present as emergency cases. RAFT Agencies may recommend that applicants complete a budgeting or financial literacy class, but approval may not be contingent upon the applicant attending a class.

If a family is determined ineligible for RAFT following a screen, they may choose to continue to work with RAFT Agency staff to identify other programs and resources.

Regional Administration

Each RAFT Agency administers RAFT in a specific region of the state. Exhibit B shows a breakdown of each RAFT Agency and its cities/towns. Families must be approved for RAFT by the RAFT agency that covers the city/town in which they live, or, if the funds are used to access new housing, to which they are moving. If a family applies for RAFT in one region and then

locates housing in a different region, the RAFT Agency will transfer the RAFT file and all collected documentation to the RAFT Agency in the appropriate region. If a family uses RAFT to move out of state, the application and payments will be processed by the RAFT Agency that covers the city/town in which the family is at risk of homelessness.

Documentation

All approved RAFT participants must provide the following documentation. This documentation must be kept in the participant's case file.

1. HCEC intake
2. RAFT/ERMA screen
3. RAFT/ERMA application, which includes Fair Information Practices Act statement of rights, DHCD RAFT/ERMA release, and RAFT/ERMA Participant Contract
4. RAFT Housing Plan
5. Proof of housing crisis*
6. Identification*
7. Proof of income*
8. Proof of housing*
9. Copies of invoices for any payments made, other than payments to property owners
10. Property owner documentation, if applicable:
 - a. RAFT Owner Contract
 - b. Form W-9
 - c. Proof of ownership for the property for which payments will be made

*These items are clarified below.

Identification

1. Each household member must provide at least one form of identification. Acceptable identification must include the family member's name and date of birth. Some examples of acceptable identification are: driver's license, birth certificate, passport, and state-issued ID.
2. Household must provide verification of the Social Security number of all family members who have been assigned Social Security numbers. If the household does not have the Social Security card(s) available, they may provide government-issued documentation that includes the Social Security number instead.

Proof of Income

1. Household must provide written documentation of all income for all family members who are at least 18 years of age.
2. Documentation cannot be older than 60 days.
3. Documentation must demonstrate a full month's worth of consecutive pay.
4. The DHCD document "RAFT Income Definitions" explains what must be included, what must be excluded, and what must be deducted from household income when calculating income for eligibility purposes.

Proof of Housing

Each family must provide proof of their current housing situation and of their future housing, if applicable. In some cases a family's proof of housing crisis may also serve as proof of housing. For example, a family who is doubled-up and must leave and who provides a letter to that effect may use that letter as proof of their current housing situation and as proof of their housing crisis. Any family using RAFT to move to new housing must provide proof of the new housing in the form of a lease, tenancy at will agreement, or other verification from the property owner. If a family is using RAFT to move into a unit with a subsidy, proof of the total contract rent and of the tenant's rent share must be provided. Depending on which agency or housing authority administers the voucher or subsidy, this may take the form of a lease or a rent share letter.

Rent Arrearage

Notice of rent arrears (for Upstream Rent Arrears housing crisis) or Summary Process Summons and Complaint identifying the applicant(s) as the Defendant(s)/Tenant(s)/Occupant(s), which sets forth a hearing date within thirty (30) days (for Eviction housing crisis).

If a family has already been to court for eviction and has signed an Agreement for Judgment, RAFT Agencies should use their discretion as to whether there is imminent risk of homelessness and whether RAFT funds should be paid. For example, if a family has signed an Agreement for Judgment that stipulates that they pay an extra \$100 per month, and this is deemed to be affordable for the family, RAFT funds should not be used. However, for example, if a family has signed an Agreement for Judgment that states that they pay \$3000 within a month, and this is not feasible for the family, RAFT approval may be an appropriate outcome.

Rent Arrearage for Families Residing in Subsidized Housing

The same documentation listed above in "Rent Arrearage" is required.

Further:

1. Households residing in subsidized housing cannot receive payment for more than six months of rent arrears.
2. Households residing in subsidized housing must demonstrate a hardship that caused the nonpayment of rent that was presumed to be affordable before RAFT may be used to pay for up to six months of their rent arrears.
3. Households residing in subsidized housing cannot receive RAFT assistance for subsidized rent arrears twice in 24 months.

In determining whether a LIHTC ("Tax Credit") unit should be considered subsidized housing, RAFT Agencies should follow the EA rule on LIHTC units: LIHTC units are considered subsidized if

the tenant's portion of the rent is less than 50% of the tenant's household income. RAFT Agencies should use a family's gross monthly income when making this determination.

Utility Arrearage or Heating Fuel

A copy of a recent utility shutoff notice, or verification from the utility company that services are at risk of shutoff or have already been shut off. Households may not receive RAFT assistance for the same utility (with the exception of home heating oil) within two consecutive fiscal years. For example, if a family received RAFT for a gas bill in FY20, they are not eligible for assistance with a gas bill in FY21. *This requirement has been temporarily waived during the COVID-19 pandemic and DHCD will notify RAFT agencies when the requirement is reinstated.* Families should not be approved for RAFT for utilities if they have not first exhausted all other options, including applying for Fuel Assistance if available, or asserting shutoff protection(s) on their utility account. During the Winter Moratorium on utility shutoffs, RAFT funds should not be used to prevent shutoff, as families with low income will not receive shutoff notices during that time.

If a family is approved for RAFT for payment of home heating oil because of an empty or near-empty tank, the RAFT Agency should use its discretion in determining an appropriate benefit level. Because there is no equivalent to shutoff protection for households who heat with oil, families may receive assistance with oil in consecutive fiscal years or multiple times in the same fiscal year if the RAFT Agency determines there is sufficient need.

Move-in Costs

A lease, tenancy at will agreement, or other written verification from the property owner outlining the terms of the tenancy/agreement and specifying what costs are required. RAFT may not be used to pay broker fees.

Monthly Rental Stipend Payment

Based on a review of household's income and expenses, and coordination with the primary tenant if applicable, the agency will determine the amount needed for housing stipends. Households residing in subsidized housing cannot receive RAFT assistance in the form of a monthly stipend.

Property Owner Documentation

In order for an RAFT Agency to make a RAFT payment to a property owner on behalf of a participant family, that property owner or his/her agent must provide:

1. Completed W-9 tax form
2. Proof of ownership (deed, most recent real estate tax bill, or current property insurance policy). The agency that is administering RAFT may also verify property ownership with a local municipal Assessor's Office or with the Registry of Deeds. If this option is used, the agency must maintain a printed copy of such verification in the applicant file.
3. RAAs, at their discretion, may require proof of compliance with the Massachusetts Lead Law when paying rent arrears, start-up costs, or stipends to a property owner.

Conflict of Interest

Before an Administering Agency makes a payment on behalf of a RAFT participant residing in or moving to a unit that is owned or operated by the RAFT Agency or its subsidiary, the RAFT Agency must disclose this conflict of interest to DHCD.

As outlined in Attachment A, if a member, officer, director, or employee of the RAFT Agency seeks to apply for RAFT, they must apply at the RAFT Agency that is closest to their residence and that is not the same RAFT Agency that they are affiliated with. If they are approved for funds, the RAFT Agency that completed the application should process the funds.

Participant File

RAFT administering agencies are responsible for maintaining a file for all RAFT families and all files must be maintained in a consistent and orderly manner and in compliance with Executive Order 504. RAFT Agency staff is responsible for ensuring that all program and contract documents are signed and dated by the appropriate parties. Any notation on files or documents must also be signed and dated by appropriate staff. The agency must maintain all files and records until further notice from DHCD.

Each RAFT family file must contain at least the following documentation:

- HCEC Intake
- RAFT/ERMA Screen
- RAFT/ERMA application, which includes Fair Information Practices Act statement of rights, DHCD RAFT/ERMA release, and RAFT/ERMA Participant Contract
- RAFT Housing Plan

- RAFT Primary Tenant Agreement (only if a participant is moving in as a guest of a leaseholder)
- Verification of housing crisis
- Assistance type and amount
- All correspondence on behalf of client
- RAFT Agency Release of Information Form
- Income verification
- Documentation of vendor payments on behalf of household
- Contact information for vendors or host families
- Copies of invoices for all approved expenditures (such as for furniture, moving expenses, transportation and/or utility arrearage payments)
- Eligibility letter (if approved. Each RAFT agency will create its own eligibility/payment approval letter)
- RAFT Notice of Ineligibility/Termination (only for families who are found ineligible for RAFT. This is a DHCD form)
- Proof of housing
- Owner Contract (if a payment is made to a property owner)
- Proof of ownership of property (if a payment is made to a property owner)
- Form W-9 and all necessary taxpayer identification information (if a payment is made to a property owner)
- All documents, letters, and case notes associated with any review

Denials and Administrative Reviews

Denials

A family may be found ineligible for RAFT at the time of the RAFT screen, during the RAFT application process, or after their application is complete. Families who are ineligible or who become ineligible for RAFT will receive a RAFT Notice of Ineligibility/Termination. The appropriate ineligibility reason should be marked. These reasons are described below.

- Incomplete Documentation: a household failed to provide all of the documentation that was requested of them during the application process.
- Over Income: a household was found to have income over 50% AMI.
- Not an Eligible Household: a household was found to be categorically ineligible for RAFT, or did not meet the minimum screen point threshold to qualify.
- Participant Non-Compliance: a household came out of compliance with the Participant Agreement or other program requirements while receiving RAFT.
- Not At Risk of Homelessness: a household did not demonstrate an eligible housing crisis.

- **Property Owner Not Willing to Participate:** a landlord refused to accept RAFT payments, whether directly, or by not submitting required property owner documentation to the Administering Agency.
- **Receiving Other Benefits:** a household received HomeBASE or RAFT in the last 12 months and receipt of the requested benefits would make them exceed the program limit of \$10,000 in combined HomeBASE and RAFT or \$4,000 in RAFT.
- **Other:** a household is ineligible for some other reason. DHCD anticipates that most ineligible households will be ineligible for one of the above-listed reasons. If a household is found ineligible for some other reason, the Administering Agency should make the reason clear by making a note on the RAFT Notice of Ineligibility/Termination or by attaching a letter to the Notice.
- **No Funding:** a household does not receive RAFT because the RAFT Agency has exhausted its funding for the fiscal year.

Administrative Reviews

Households who are found ineligible for RAFT and who disagree with the ineligibility decision may request an administrative review of their denial. The applicant's right to a review is described in the RAFT Notice of Ineligibility/Termination. Each Administering Agency must fill in the appropriate address on page 2 of the Notice before sending it to any ineligible applicant. The applicant has 10 days from the date of the notice to request a review. Reviews will be performed, within 15 days from the request for a review, at the Administering Agency level by a supervisor who is familiar with the program but unfamiliar with the particular case being reviewed. The decision should be sent to the client and a copy of the written finding should be placed in the applicant's file. There is no appeal to DHCD of this finding.

The RAFT Agency may determine that a household does not meet the minimum eligibility or qualification standards for any of the following reasons and will include these in the eligibility letter if a benefit is being denied:

Immediate Termination

Immediate termination may occur when any member of the RAFT household:

- Engages in drug or violent criminal activity;
- Threatens DHCD or RAFT agency staff, employees of the property owner, or others;
- Is evicted from a unit for nonpayment of rent or other "at-fault" reason;
- Vacates a unit without notifying the agency that is administering RAFT; or
- Commits fraud in connection with the program.

If immediate termination is necessary, the RAFT administering agency will notify the participant in writing, stating the reason(s) for termination. A copy of the termination letter will be maintained in the participant's file. If requested in writing by the program participant, a review may be conducted at the agency level within 15 calendar days. If the termination is upheld all further benefit will be suspended.

Fair Housing and Language Access

In keeping with all DHCD and HUD program regulations, and as part of the intent of the RAFT program, DHCD and all partner organizations will comply with all applicable nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) and will administer RAFT in an affirmative manner to further fair housing. This will include making reasonable modifications and accommodations needed by applicants and program participants, consistent with federal and state fair housing laws.

RAFT families with limited English proficiency (“LEP”) may not be denied meaningful access to the program. Meaningful access includes the process and documents associated with an assessment, application, and any disciplinary or appeals procedures. Each RAFT Administering Agency has its own Language Access Plan (“LAP”) which details how an agency provides services to persons with LEP.

If a client is LEP, staff must use the translated vital documents provided by DHCD and follow the RAFT Agency’s LAP. Any spoken communication should be done either with bilingual staff or with the use of an interpreter, and any forms provided should be made available in the client’s preferred language, if it is a language into which the forms have been translated. If not, the forms can be read to the LEP client using an interpreter.

There are two forms that must accompany any documents (in person or mailed) that are to be received or signed by a participant with LEP.

1. *Notice of Important Document.* This notice must accompany all vital RAFT documents. The RAFT Agency contact information must be listed.
2. *Legal Notice Translation.* This notice must accompany any documents signed by the participant. The English version of the documents will always be the legally binding version while a translated version should also be signed. A copy can be kept in the participant record and the original given to the participant along with the *Legal Notice Translation* form.

Accounting and Fiscal Management

Allocation of Funds

Allocation of RAFT funds to the RAFT Administering Agencies will be determined by DHCD based on demand determined by data from both EA and HomeBASE. In FY21, the Department will set aside a reserve fund that will be distributed as necessary to regions with high demand for RAFT

assistance. RAFT Administering Agencies will be paid an administrative fee equal to 18.95% of all service dollars paid in that month.

In the event DHCD is notified of a suspension, termination, or reduction in RAFT funding, in whole or in part, or if DHCD reasonably believes that any such action is forthcoming, DHCD shall provide the Contractor with written notice to decrease or terminate RAFT activity as appropriate.

Financial Management

The RAFT agency is responsible for establishing a comprehensive financial management system and related internal controls to ensure that funds are spent in an efficient and effective manner.

The financial management system must include but is not limited to:

1. Maintaining the accounting books and records according to generally accepted accounting principles and any other DHCD requirements;
2. Preparing annual operating statements and financial statements; and
3. Cash management of income and expenses, including the distribution of funds made on behalf of each participant.

Vendor Payments

The RAFT regional administering agency will make direct payments to participating vendors (property owners, utility companies, etc.) on behalf of the program participant up to the level of financial assistance provided each family through RAFT. The agency may require that payments be made by direct deposit rather than by paper checks.

All FY21 RAFT payments must be disbursed within FY21. Payments for households who apply in FY21 may not be made any later than June 30, 2021.

Data Collection

In FY21 DHCD and the RAFT Agencies will utilize Housing Pro, a product of MRI Software, for RAFT screening, applications, and reporting. DHCD will be responsible for determining the minimum data collection elements and for ensuring that each agency has access to the necessary software systems to meet the program requirements. The following types of information will be captured in the system:

- Demographics of household relating to risk of homelessness
- Household income
- Type of RAFT award and amount
- Leasing information
- All payments made to property owners/vendors

DHCD agrees to ensure that all staff will be trained at least annually in the use of DHCD-required systems, including state and federal privacy and data security requirements, and

ongoing technical assistance will be provided by designated contacts at DHCD. The RAFT Agency must ensure that staff has adequate program knowledge and training in the utilization of systems.

RAFT Agency staff must enter complete and accurate data for all program participants into Housing Pro and must obtain required program data elements throughout program participation. Participant records should be kept up to date. DHCD will require a client information release form in order to share information among agencies that work on RAFT such as community service providers, RAAs, EA providers, and DHCD. In addition, the agency is responsible for complying with all legal requirements pertaining to the use, maintenance and dissemination of confidential information and for meeting DHCD reporting requirements in a timely and accurate manner.

Reporting

From time to time, DHCD may request to review specific participant files or for a report on progress and outcomes across the program. Some of the elements which DHCD will collect and report on regularly include at a minimum:

- Number of households applying for RAFT and reasons why
- Number of households served
- Number of households found ineligible
- Participant use of benefits – award type and amount
- Spending levels
- Participant time in program

Data requirements and program metrics may be changed by DHCD after notice and consultation with the agency may be required by DHCD to provide different or additional information.